IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE WINCHESTER DIVISION

| DIVERSE MEDICAL MANAGEMENT, INC.; AZZAM MEDICAL SERVICES, LLC, |) |
|---|------------------------|
| Plaintiffs, |) |
| v. |) Case No: 19-CV-00046 |
| PLATINUM GROUP USA, INC.; |) |
| AMER RUSTOM; |) |
| THE THIRD FRIDAY TOTAL RETURN FUND, L.P.; |) |
| MICHAEL LEWITT; |) |
| AMERICORE HEALTH, LLC; GRANT WHITE; AND |) |
| JAMES B. BIDEN, |) |
| Defendants. |))) |
| PLATINUM GROUP USA, INC.; THE THIRD FRIDAY TOTAL RETURN FUND., L.P., |))) |
| Counterclaim Plaintiffs, |) |
| v. |) |
| DIVERSE MEDICAL MANAGEMENT, INC.; |) |
| MICHAEL FREY; |) |
| NATALIE FREY; AND |) |
| MOHANNAD AZZAM, |) |
| THE THE THE THE |) |
| Counterclaim Defendants |) |

NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD

Attorneys Scott Hickman and Webb Campbell of the law firm Sherrard Roe Voigt & Harbison, PLC, pursuant to the Local Rule 83.4(f), file this Notice of Withdraw as Counsel of Record for Defendants Platinum Group USA, Inc., James Biden, and Amer Rustom, and state as follows:

1. Mr. Campbell previously filed a motion for leave to appear *pro hac vice* as counsel

of record for Defendants Platinum Group USA, Inc., James Biden, and Amer Rustom. The Court

granted this motion for pro hac vice admission on August 15, 2019.

2. On October 30, 2019, Movants informed Defendants Platinum Group USA, Inc.,

James Biden, Amer Rustom in writing of their withdrawal from representing them consistent with

the terms of their contractual engagement and one or more subsections of Tenn. RPC 1.16 (b).

3. Defendants Platinum Group USA, Inc., James Biden, and Amer Rustom are

represented by other counsel of record, namely George R. Mesires, Yasmin N. Best and Joan A.

Akalaonu of Faegre Baker Daniels LLP, satisfying the requirements of Local Rule 83.4.

Dated November 15, 2019

Respectfully submitted,

By: /s/ Scott Hickman

SHERRARD ROE VOIGT & HARBISON, PLC

Scott Hickman (BPR No. 017407)

Webb Campbell (BPR No. 011238)

(Admitted *Pro Hac Vice*)

150 3rd Ave. South, Suite 1100

Nashville, TN 37201

T: (615) 742-4200

F: (615) 742-4539

SHickman@srvhlaw.com

WCampbell@srvhlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Unopposed Motion to Withdraw as Counsel was served upon undersigned counsel by the Court's CM/ECF filing system on the 15th day of November, 2019.

Robert A. Peal
Mark W. Lenihan
SIMS|FUNK, PLC
3322 West End Avenue, Suite #200
Nashville, TN 37203
(615) 292-9335
rpeal@simsfunk.com
mlenihan@simsfunk.com

Counsel for Diverse Medical Management, Inc. and Azzam Medical Services, LLC

George R. Mesires
Joan A. Akalaonu
FAEGRE BAKER DANIELS LLP
311 South Wacker Drive, Ste. 4300
Chicago, IL 60606
George.mesires@faegrebd.com
joan.akalaonu@faegrebd.com

Yasmin N. Best FAEGRE BAKER DANIELS LLP 11766 Wilshire Blvd., Ste. 750 Los Angeles, CA 90025

Counsel for Platinum Group USA, Inc., James Biden and Amer Rustom Jared A. Cox
Aaron W. Marcus
BINGHAM GREENEBAUM DOLL LLP
3500 PNC Tower
101 South Fifth Street
Louisville, KY 40202
jcox@bgdlegal.com
jcox@bgdlegal.com

Counsel for Americore
Health, LL and Grant White

David R. Smith
LAW OFFICE OF DAVID RANDOLPH
SMITH AND ASSOCIATES
1913 21st Avenue South
Nashville, TN 37212
drs@drslawfirm.com

Counsel for The Third Friday Total Return Fund, L.P. and Michael Lewitt

/s/ J. Scott Hickman